

# **EXHIBIT H**

BLANK ROME LLP  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174-0208  
Telephone: (212) 885-5000  
Kenneth L. Bressler  
Philippe M. Salomon  
Andrew B. Eckstein  
*Attorneys for Och-Ziff Capital Management Group LLC*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X	
In re:	:
Lehman Bros. Holdings, Inc., <i>et al.</i> ,	:
	:
Debtors.	:
	:
----- X	

Chapter 11  
Case No. 08-13555 (JMP)  
(Jointly Administered)

**OCH-ZIFF CAPITAL MANAGEMENT GROUP LLC'S FIRST SET OF  
INTERROGATORIES AND DOCUMENT REQUESTS DIRECTED TO DEBTORS**

Och-Ziff Capital Management Group LLC, by and through its undersigned counsel,  
hereby requests that Lehman Bros. Holdings, Inc., *et al.*, answer the following interrogatories  
separately and fully, in writing and under oath, and produce the requested documents, pursuant  
to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, made applicable to this contested  
proceeding by Rules 7026, 7033 and 7034 of the Federal Rules of Bankruptcy Procedure.  
Answers should be served and documents produced upon the undersigned at the below address  
within thirty (30) days of service of these Interrogatories and Documents Requests in accordance  
with the applicable rules.

**INSTRUCTIONS**

1. In responding to these discovery requests, you are required not only to furnish  
such information and documents as you know from your own personal knowledge, but also

information that is in the possession of your attorneys, investigators, employees, agents or anyone else acting on your behalf.

2. If you cannot answer an Interrogatory in full after exercising due diligence to secure the information, you are to answer the Interrogatory to the extent possible, specifying your inability to answer or respond to the remainder and stating whatever information or knowledge you have concerning the unanswered or unresponded to portions and the efforts you have undertaken to secure the information sought.

3. You have a continuing duty to supplement your responses to these discovery requests.

#### **DEFINITIONS**

A. The definitions and rules of construction set forth in Local Civil Rule 26.3(c) and (d), as made applicable by Local Bankruptcy Rules 9014 and 7026-1, are incorporated herein.

B. "*Lehman*" or "*You*" means the Debtors, Lehman Bros. Holdings, Inc., *et al.* and each of their current or former subsidiaries, affiliates, parents, predecessors and successors, divisions, departments, and operating units and all persons or entities acting or purporting to act on their behalf, including attorneys, accountants, financial advisors, and clerical staff.

C. "*Person*" refers to any individual person (whether living or deceased), partnership, firm, corporation, association, joint venture, or other entity.

D. "*Och-Ziff*" means Och-Ziff Capital Management Group, LLC and any affiliated company.

E. The "*Examiner's Report*" means the Report of Anton R. Valukas, Examiner, dated March 11, 2010, issued in the instant bankruptcy proceeding.

F. "*Relevant Time Period*" means January 1, 2008 through January 1, 2009.

**INTERROGATORIES**

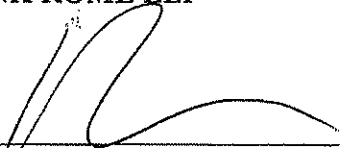
1. Identify each person who was consulted in connection with or participated in the preparation of the answers to these Interrogatories.
2. Identify each person who identified Och-Ziff as a "source of information" as represented by Michael Bowe, Esq. on May 26, 2010 as justification for taking Rule 2004 discovery of Och-Ziff.
3. Identify all documents concerning or identifying Och-Ziff as a "source of information" about Lehman during the Relevant Period.

**DOCUMENT REQUEST**

1. Produce all documents identified in response to the above Interrogatories.

Dated: New York, New York  
June 25, 2010

**BLANK ROME LLP**

By:   
Kenneth L. Bressler  
Philippe M. Salomon  
Andrew B. Eckstein  
405 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 885-5000  
*Attorneys for Och-Ziff Capital Management  
Group, LLC*

TO: Michael J. Bowe, Esq.  
Kasowitz, Benson, Torres & Friedman LLP  
1633 Broadway  
New York, New York 10019